

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

PFIZER INC.,

Plaintiff,

v.

JOHNSON & JOHNSON and JANSSEN
BIOTECH, INC.,

Defendants.

Civil Action No. 2:17-cv-04180-JCJ

IN RE: REMICADE ANTITRUST
LITIGATION

Civil Action No. 2:17-cv-4326-JCJ

**PLAINTIFFS' MOTION TO COMPEL DEFENDANTS TO PRODUCE
DOCUMENTS CONCERNING PAYER CONTRACTS FOR REMICADE**

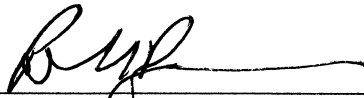
Plaintiffs in the above-captioned cases (“Plaintiffs”) hereby move the Court to compel Defendants Johnson & Johnson and Janssen Biotech, Inc. (“J&J”) to produce documents concerning J&J’s contracts with certain specified third-party payers relating to J&J’s product, Remicade. Such documents are relevant because, as alleged in Plaintiffs’ complaints, J&J intended to and did enter contracts with third-party payers to preserve its monopoly in Remicade by blocking competition from biosimilars to Remicade. The documents are proportional to the needs of the case considering the significant public importance of the issues at stake, the large amount in controversy, J&J’s exclusive access to relevant information, J&J’s substantial resources, the criticality of the discovery in resolving the issues, and the limited burden of the proposed discovery in comparison to its likely benefit. The facts and law in support of the motion are more fully set forth in the accompanying Memorandum.

WHEREFORE, Plaintiffs respectfully request that the Court enter the proposed Order

granting Plaintiffs' Motion to Compel Defendants to Produce Documents Concerning Payer Contracts for Remicade.

Date: November 4, 2019

Respectfully submitted,

/s/ 

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CERTIFICATE OF SERVICE

I, David H. Suggs, hereby certify that on November 4, 2019, I caused true and correct copies of Plaintiffs' Motion to Compel Defendants to Produce Documents Concerning Payer Contracts for Remicade, and I served by electronic mail upon the following counsel for the Defendants:

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